



# STATE OF CONNECTICUT DEPARTMENT OF AGRICULTURE

Office of the Commissioner



Bryan P. Hurlburt  
Commissioner

860-713-2501  
www.CTGrown.gov

August 27, 2020

Melanie A. Bachman  
Executive Director  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

Re: PETITION NO. 1422 - Greenskies Clean Energy, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 4.99-megawatt AC solar photovoltaic electric generating facility to be located at Mulnite Farms, Inc. off Barber Hill Road west of the intersection with Rockville Road, East Windsor, Connecticut and associated electrical interconnection.

Dear Executive Director Bachman:

Pursuant to 16-50k(a) of the Connecticut General Statutes, we have reviewed the above cited project with respect to agricultural impacts, specifically whether or not the project will result in a material impact to the status of prime farmland.

The project site is approximately 39 acres, of which the solar project foot print is planned to contain approximately 24 acres of mapped prime farmland. The developers (Greenskies) have stated that they intend to develop this project with a co-use of rotational sheep grazing on the site.

Through correspondence to the Department of Agriculture, dated July 14, 2020 (attached), Greenskies has represented (in summary) the following to the Department concerning their co-use plan:

- 1) Greenskies has stated they will propose a co-use of rotational grazing of livestock (sheep);
- 2) Greenskies intends to partner with the American Solar Grazing Association (ASGA) to identify sheep farmers in Connecticut who will be willing to work on the project and develop a comprehensive grazing plan for implementation;
- 3) Greenskies has also stated that they will use a seed mix developed, in part, to address the nutritional needs of sheep, while providing a low-growing, easily maintained and sustainable vegetation solution for solar installations; and
- 4) Greenskies has stated they intend to propose a small apiary consisting of four to five beehives.

The specifics of the proposed co-use are discussed in greater detail in the July 14, 2020 letter referenced above.

As stated on a previous project incorporating this co-use approach, I want to stress to the Siting Council that there are certainly other considerations in a co-use such as this one which includes livestock. For example, developers, in partnership with the farmer, will need to consider how sheep will coexist with the solar panels, the site fencing, cable trays, etc. The developers will also be expected to provide the necessary infrastructure to accommodate housing, feeding, watering to support general herd management practices. Developers need to ensure there is an adequate plan for care and management of the sheep and training for anyone working at the site to ensure that both worker and animal welfare is effectively managed. It will also be necessary to ensure there is adequate signage/security in and around the site noting that live animals are grazing on the property.

Presently, the logistics and stipulations surrounding this project enable the agency to support this incorporation of agricultural co-use. Further, because successful implementation of this proposed co-use will keep production agriculture activities throughout this site, the Department of Agriculture can conclude that there does not appear to be a material impact on the status of prime farmland. The Department of Agriculture retains the ability to raise concerns and opposition in the future as detailed plans are provided by the developers.

If you have any questions, please feel free to contact either myself or Stephen Anderson of my staff. Steve can be reached at [stephen.anderson@ct.gov](mailto:stephen.anderson@ct.gov), or at (860) 713-2592.

Sincerely,



Bryan P. Hurlburt  
Commissioner

Cc: Katie Dykes, Commissioner, Department of Energy and Environmental Protection  
Lee Hoffman, Pullman & Comley LLC

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July 14, 2020

**VIA ELECTRONIC MAIL**

Stephen Anderson  
State of Connecticut Department of Agriculture  
450 Columbus Blvd., Suite 701  
Hartford, CT 06103

**Re: Solar Energy Project Considerations, Mulnite Farms, East Windsor, Connecticut -  
Plan for Co-use of Solar and Agriculture on Prime Farmland Soils**

Dear Mr. Anderson:

I am writing on behalf of my client, Greenskies Clean Energy, with respect to its proposed project to be located at Mulnite Farms, in East Windsor, Connecticut. This is a follow up to my April 1, 2020 and June 4, 2020 letters regarding the project as well as our in-person consultations. The reason for my writing is to provide you with an update concerning our proposal for agricultural co-use at this site. For your ease of review, I am including a basic map of the project site with this letter.

As you may recall, the Mulnite Farms parcel consists of 39 acres, all of which are prime farmland soils. The map I have attached came directly from the NRCS soil report of the site with a mock up including the parcel boundary and proposed project area. As indicated, the approximate area of the project is 24 acres. there is a single soil type on site: Narragansett silt loam, 2 to 8 % slopes (identified as soil map unit 66B in the map).

Greenskies is proposing to develop this project along with: 1) a co-use of rotational grazing of livestock, 2) improvement of soils in connection with the grasses and flowers to be planted at the site, and 3) a small apiary consisting of four to five beehives. The specifics of the proposed co-use are discussed in greater detail below.

Greenskies has been working on this project with Lexie Hain, who is the Executive Director of the American Solar Grazing Association (ASGA). Greenskies intends to partner with the ASGA to identify sheep farmers in Connecticut who will be willing to work on the project and develop a comprehensive grazing plan for implementation, assuming the Department agrees to this project. Based on Greenskies' discussions with the ASGA, we have been informed that

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Greenskies should plan on approximately 3 to 4 ewes per acre for grazing. For the Mulnite Farms project, this would mean that the herd would be approximately 100 sheep.

Where the sheep would reside is a preference of the individual farmer. Most likely, the farmer would bring the sheep to the site for six to seven months out of the year. The farmer would bring the sheep to the site in April or early May, and the sheep will remain at the site until October or November. Greenskies will provide the water for the sheep and will provide shelter for the sheep if they will be overwintering at the project site.

In addition to having the sheep graze the site, Greenskies intends to use the “Fuzz & Buzz” seed mix created by Ernst Pollinator Service and the ASGA as the vegetative cover for the site. The Fuzz & Buzz seed mix was developed, in part, to address the nutritional needs of sheep, while providing a low-growing, easily maintained and sustainable vegetation solution for solar installations. The plant species chosen for the mix were evaluated by the Cornell University Sheep Program for their palatability to sheep. The diversity of grass and flowering species in the seed mix adds the ecological benefit of providing pollen and nectar sources for honeybees, native pollinator species, birds and other wildlife. The mix includes rye grass, orchardgrass, bluegrass, clover, daisy, blue chicory and other varieties. The mix composition can be found on Ernst Seeds website using this link: <https://www.ernstseed.com/product/fuzz-buzz-mix-standard/>.

There are numerous benefits associated with this undertaking. The site will continue to be used for agricultural production, just in a different form. The combination of rotational grazing and nitrogen-fixing vegetation included in the seed mix is expected to have a positive effect on soil fertility throughout the lifespan of the project, leaving the land more suitable for agriculture upon decommissioning. The travel of the sheep will also serve to improve soil as their hooves are anticipated to assist in the decompaction of the soil, which will be another benefit. Finally, the pollinators in the area will be assisted by the plants grown from this seed mix, and will be bolstered in their ability to pollinate area farms.

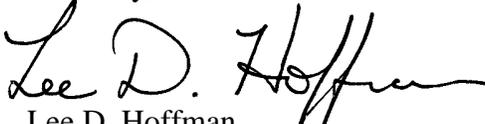
Perhaps even more importantly, two farmers will benefit economically from proceeding in this fashion. The sheep farmer will benefit in that grazing contracts are typically negotiated for the lifespan of the project, which in this case will be 20-25 years. This will provide the sheep farmer with a long-term source of stable income. Moreover, the Mulnite Farm will benefit from the lease payments it will receive for the use of its land, thereby being able to use that income stream to farm its other properties. Finally, it should be noted that the existence of the solar project protects farmland soils on site from more destructive and permanent types of development, such as residential subdivisions.

Accordingly, Greenskies would reiterate its request to the Department that it provide a letter to the Siting Council indicating that if Greenskies proceeds with its project in the fashion outlined above, it will not have an adverse impact on agriculture. Please let me know if this approach is acceptable to you as quickly as possible.

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We look forward to working with the Department on this matter. Should you have any questions, please contact me at your convenience. Thank you in advance for your consideration.

Sincerely,

  
Lee D. Hoffman

Enclosure

